

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

RICHARD J. HILL,

Plaintiff,

v

JUSTIN WONCH,

Defendant.

U.S. District Judge:
Hon. Hala Y. Jarbou

U.S. Magistrate Judge:
Maarten Vermaat

Case No: 2:19-cv-159

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**DEFENDANT OBJECTIONS TO PLAINTIFFS PROPOSED TESTIMONY
OF VICKIE LARA**

Page 38 Line 2-5. Ms. Lara's past history of her pain with broken bones is not relevant to any of the issues in this case. FRE 401 and 403

Page 38 Line 19 through Page 39 Line 11. Plaintiff is attempting to present testimony about Mr. Hill being in pain as he was being taken out of the house. The Court has already ruled that this evidence is not relevant to our case.

Page 40 Line 4-15. Plaintiff is again attempting to present testimony about Mr. Hill being carried out of the house to the ambulance. Not relevant

Page 75 Line 5-8. Vickie Lara is not an expert in determining whether or not Mr. Hill was seriously injured at that time.

Page 75 Line 18 through Page 77 Line 6. Vickie Lara again is not an expert to know why Mr. Hill could not stand up at that time and could not know if Mr. Hill was in pain.

Page 87 Line 10 through Page 88 Line 6. Ms. Lara has no expertise to know whether or not Mr. Hill was injured during his scuffle with Mr. Normand.

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Page 90 Line 8 through Page 91 Line 2. Ms. Lara can describe what she saw, but she is not an expert in providing an opinion as to what was necessary for Officer Wonch to do in this situation.

Respectfully submitted,

KITCH, DRUTCHAS, WAGNER, VALITUTTI &
SHERBROOK

By: /s/ Thomas R. Shimmel

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